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1 A. Yes.  
 2 Q. Did you have a telephone number at the  
 3 company before you left?  
 4 A. No, they had only one phone in the  
 5 department.  
 6 Q. When you came back, was that correct as  
 7 well?  
 8 A. That was correct.  
 9 Q. At some point did that change?  
 10 A. That changed when we moved to Billerica.  
 11 Q. Which was approximately when?  
 12 A. I'm not sure of the exact date. I'd have to  
 13 see my papers.  
 14 Q. All right. So before you left in '79, you  
 15 did not have your own phone?  
 16 A. It was a department phone.  
 17 Q. A department phone. After the move to  
 18 Billerica, did you have your own phone?  
 19 A. Yes.  
 20 Q. Did you have your own extension number?  
 21 A. Yes.  
 22 Q. Do you recall what that was?  
 23 A. 5129.  
 24 Q. You testified earlier this morning or this

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1 morning that -- I asked you a couple of questions  
 2 about what graphic art is or commercial art is. And  
 3 you testified that it changed significantly with the  
 4 advent of computers, correct?  
 5 A. Correct.  
 6 Q. When did that take place?  
 7 A. Approximately -- well, it was the late  
 8 '80's. Around '88, '89.  
 9 Q. And you didn't take any courses or have any  
 10 formal education --  
 11 A. No, that was my first presentation of a  
 12 computer to me, other than an Atari computer, game  
 13 computer.  
 14 Q. Did you learn to do the graphic arts work on  
 15 the computer?  
 16 A. Yes.  
 17 Q. How did you learn that?  
 18 A. Trial and error.  
 19 Q. Were you self-taught?  
 20 A. Self-taught. We kind of helped each other.  
 21 Sorry to interrupt.  
 22 Q. No, that's fine, thanks. When you say "we"  
 23 helped each other, who are you referring to?  
 24 A. The other graphic artists in the department.

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1 Q. This is in the late '80's, is that the  
 2 approximate time frame?  
 3 A. Yes.  
 4 Q. At that point, did you have a computer at  
 5 home?  
 6 A. No.  
 7 Q. Do you recall when you --  
 8 A. Atari computer, I'm sorry.  
 9 Q. What's that?  
 10 A. We had an Atari computer.  
 11 Q. Did that do anything other than play games?  
 12 A. It did word processing.  
 13 Q. Would it run graphics programs at all?  
 14 A. I wouldn't call them graphics programs, but  
 15 it had limited ability to do anything on it.  
 16 Q. Did you teach yourself on that computer as  
 17 well?  
 18 MR. WILGOREN: Objection. Teach  
 19 yourself what?  
 20 Q. I can ask this -- I thought you indicated  
 21 you sort of taught yourself how to use the computer  
 22 for graphic arts. The question is whether you used  
 23 the home computer, the Atari computer to educate  
 24 yourself in how to use graphic computer software at

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1 all?  
 2 A. They're kind of related but really not.  
 3 They're two extremes.  
 4 Q. What do you mean by that?  
 5 A. The Atari is so basic and the computers at  
 6 that time were so basic, you couldn't draw a  
 7 straight line on them.  
 8 Q. Okay. That gradually changed over the  
 9 course of the time you were providing services to  
 10 Bull?  
 11 A. Yes, yes, it did.  
 12 Q. Is it fair to say that change was gradual  
 13 but steady over the -- from late 1980's until early  
 14 2000?  
 15 A. Yes, it was very steady.  
 16 Q. How were you keeping up with the changes?  
 17 A. We -- they would get newer computers, faster  
 18 computers, color computers, and more jobs were being  
 19 done on the computer.  
 20 Q. How would you learn to use the new  
 21 computers?  
 22 A. Jump in and do it.  
 23 Q. And you did that yourself?  
 24 A. I did.



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1 about the document. Let me call your attention to  
2 interrogatory number six, which is on the bottom of  
3 page three. If you can read to yourself  
4 interrogatory number six, and the answer is on  
5 page -- begins on page four. Do you see that  
6 answer?  
7 A. Yes.  
8 Q. In the first paragraph -- actually, it's  
9 technically the second paragraph of the response  
10 talks about a meeting that you had with Cecile  
11 Wright of the human resources department, right?  
12 A. Correct.  
13 Q. And I believe this morning you testified in  
14 response to one of my questions, you indicated that  
15 after being presented with the documents that are --  
16 have been marked as Exhibits 3 and 4, particularly  
17 Exhibit 3, which was the Integris agreement,  
18 sometime after that you did a little investigation.  
19 And then after that, spoke with Ms. Wright; is that  
20 correct?  
21 A. Correct.  
22 Q. Is the conversation that's described in this  
23 paragraph on page four of Exhibit 9, was that the  
24 discussion you were referring to in your earlier

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1 testimony?  
2 A. Yes.  
3 Q. As I understand your response to this  
4 interrogatory, that was the first discussion you had  
5 with anybody at Bull as to employee benefits?  
6 A. Yes.  
7 Q. Does this paragraph accurately reflect your  
8 discussion with Ms. Wright?  
9 A. Yes, it does.  
10 Q. And there's a reference to a P-A-C-E  
11 website.  
12 A. Yes.  
13 Q. Is that the website that -- bear with me  
14 while I get the numbers correct here. Exhibit 5,  
15 which is your e-mail to Dungaree Dan and his  
16 response, is that the website that Exhibit 5 came  
17 from?  
18 A. Yes.  
19 Q. I believe you testified that the answer from  
20 Dan that's contained on Exhibit 5 was or that  
21 Mr. Dan or Mr. Dungaree, I'll call him just Dungaree  
22 Dan, you said he gave you a short response and later  
23 a longer response. Does Exhibit 5 reflect the  
24 longer response?

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1 A. This is the longer response that was on the  
2 Web.  
3 Q. Was the shorter response on the Web?  
4 A. No.  
5 Q. Was that just a personal e-mail to you?  
6 A. Just a personal e-mail.  
7 Q. Do you have a copy of that still?  
8 A. I believe I do.  
9 Q. Do you recall what was contained in the  
10 short response?  
11 A. Basically the same information, only in a  
12 shorter version of it. It didn't get into answering  
13 the questions one on one like he does here.  
14 Q. Did you have any other e-mail or any other  
15 communication with Dungaree Dan, other than that  
16 question that's contained in paragraph 5?  
17 A. No, I did not.  
18 Q. Excuse me, Exhibit 5. The February 2002  
19 meeting with Ms. Wright that's reflected in page  
20 four of Exhibit 9, had you had any prior discussions  
21 about any subject with Ms. Wright at all?  
22 A. Discussions about --  
23 Q. About anything. I withdraw that and ask  
24 this. Did you know Ms. Wright before then?

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1 A. Yes.  
2 Q. How did you know her?  
3 A. She was vice president of human resources,  
4 and she was one of the clients of the company that  
5 would request work.  
6 Q. So when you say she was one of the clients,  
7 the graphic arts people would actually produce  
8 materials for the human resources department?  
9 A. Yes.  
10 Q. You didn't have any dealings with her in  
11 terms of having any questions or any discussions  
12 with her in terms of employee matters?  
13 A. No.  
14 Q. You indicate in the second paragraph or the  
15 next paragraph on page four, you said about a week  
16 later you had a meeting with Mr. Kurt Thalen?  
17 A. Yes.  
18 Q. Did you know Mr. Thalen before that meeting?  
19 A. As a, again, company client. He would come  
20 down and request work.  
21 Q. Was he also in the human resources  
22 department?  
23 A. Yes, he is -- was.  
24 Q. Does that paragraph that carries over from